

ORIGINAL

FILED
DISTRICT COURT OF GUAM

AUG 28 2006 *Nbo*

MARY L.M. MORAN
CLERK OF COURT

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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE DISTRICT OF GUAM**

10 UNITED STATES OF AMERICA,) CRIMINAL CASE NO. 05-00053
11 Plaintiff,) GOVERNMENT'S MOTION FOR
12 vs.) SUBSTANTIAL ASSISTANCE
13 CHRISTOPHER M. ESPINOSA,) DEPARTURE
14 Defendant.)
15

16 The United States hereby moves this Honorable Court for a departure from the
17 Guidelines level, as provided by USSG Section 5K1.1, on the basis that defendant has rendered
18 substantial assistance to the government in its investigation of drug trafficking on Guam.

19 The government is filing under seal a separate sentencing memorandum concerning the
20 details of that cooperation. The government is recommending that defendant receive a sentence
21 of 87 months incarceration.

22 RESPECTFULLY SUBMITTED this 26th day of August, 2006.

23 LEONARDO M. RAPADAS
United States Attorney
24 Districts of Guam and the CNMI

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26 By: 
KARON V. JOHNSON
27 Assistant U.S. Attorney
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